

## DOCKET NO. 5:23-MC-00005

**GOVERNMENT’S MOTION FOR EXTENSION OF TIME TO FILE  
COMPLAINT FOR FORFEITURE**

On or about December 19, 2022, pursuant to a search warrant, law enforcement seized the Defendant Currency from bank accounts associated with MAA Shakti Corp Inc. and Mr. Mavani.

On January 17, 2023, U.S. Customs and Border Protection (“CBP”) sent notice of administrative forfeiture proceedings to Yogi Foods 1 and Mr. Mavani as to the Defendant Currency. On or about February 14, 2023, Mr. Mavani filed a claim with CBP pursuant to 18 U.S.C. § 983(a)(2), requesting that the Government file a complaint for forfeiture as to the Defendant Currency.

Pursuant to 18 U.S.C. § 983(a)(3), the Government has 90 days after a claim has been filed to initiate a complaint for forfeiture. Accordingly, the Government’s current deadline to file a complaint for forfeiture is May 15, 2023. However, this deadline may be extended. Specifically, 18 U.S.C. § 983(a)(3) allows “a court in the district in which the complaint will be filed [to] extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

The Government has good cause for the extension. Specifically, the Government and Mr. Mavani, through his counsel, have initiated pre-complaint settlement negotiations, but do not expect to resolve those negotiations prior to the May 15 deadline. Additionally, counsel for Mr. Mavani consents to the Government’s requested extension of time.

For these reasons, the Government requests a 30-day extension of time to file a complaint for forfeiture concerning the Defendant Currency, if any, through June 14, 2023.

Respectfully submitted this 12th day of May, 2023.

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